

## REMARKS

Reconsideration of this application is respectfully requested in view of the foregoing amendment and the following remarks.

Claims 1-5 and 7-12 were pending in this application. Claim 12 has been amended to correct a matter of form, and claims 13-15 have been added. Support for the new claims can be found in, e.g., paragraphs [0032] and [0037] of the present application. No new matter has been entered. Upon entry of this amendment, claims 1-5 and 7-15 will be pending herein. For the reasons set forth below, Applicants respectfully submit that all of these claims are in condition for allowance.

In the Office Action, claims 1, 3-5, 7 and 9-12 were rejected under 35 U.S.C. §103(a) as being unpatentable over McIntosh (U.S. 2003/0171119) in view of Serbetciouglu et al. (U.S. Patent 5,719,918) and Haumont (U.S. 2005/0108417); and claims 2 and 8 were rejected under 35 U.S.C. §103(a) as being unpatentable over McIntosh in view of Serbetciouglu, Haumont, further in view of Lam et al. (U.S. patent 6,782,276). To the extent these grounds of rejection might again be applied to claims presently pending in this application, they are respectfully traversed.

The presently claimed invention is directed to methods and systems for routing messages, and in particular, foreign initiated messages that are routed using the SS7 protocol. In the claims, an intermediary receives a request to route a message (typically an SMS message). Conventionally, such routing requests are received by a telecommunication carrier's infrastructure including a home location register (HLR) and associated mobile switching center

(MSC). In the claimed invention, on the other hand, the routing request is received by an intermediary that “appears” like the conventional infrastructure, but where, in fact, no such infrastructure exists. As a subset of the steps that the intermediary must perform to appear as, e.g., an MSC to the third party from which the request was received, the intermediary’s response to the routing request must include an International Mobile Subscriber Identity (IMSI) value (see, e.g., paragraph [0032]).

In accordance with the express limitations in the claims, and in connection with providing an IMSI value in the intermediary’s response, an “artificial” IMSI value is dynamically created and is based, at least in part, on the carrier to which the message is to be routed. For example, as explained in paragraphs [0032] and [0037], the dynamically created artificial IMSI value is generated using the mobile country code (MCC) and mobile network code (MNC) of the destination carrier, along with additional data including an internal receiver ID and an internal index, both of which are assigned by the intermediary. In other words, the artificial IMSI value is only partly made up of data (MCC-MNC) associated with the carrier to which the message is to be routed (i.e., the destination carrier).

At least one advantage of this scheme is explained in paragraph [0039] of the specification. Moreover, the created IMSI value is “allowable” and “routable” in terms of compliance with a SRIForSM message and a follow-on FSM message, where these messages are transmitted over SS7.

Haumont was cited as allegedly disclosing the “dynamic selection of an international subscriber identification (IMSI)” as indicated on page 7 of the Office Action. Applicants respectfully disagree that Haumont discloses the claimed element at issue.

Haumont discloses a method that has the effect of reducing inquiries to network components, such as HLRs. See, e.g., paragraphs [0025] and [0041]. In the disclosed method, as explained in paragraph [0042] and shown in Figure 3, a query 304 is made to the HLR 306 and information 310 that includes the IMSI of mobile subscriber 300 is returned. That information (including the IMSI) is then forwarded to SMSC 314 for further processing. In other words, the SMSC 314 can forward a message 312B to MSC/VLR 316 without also having to query HLR 306.

Notably, the IMSI value that is supplied by the HLR 306 in Haumont is the actual or real IMSI of MS 300, the intended recipient of the SMS message being sent. Such an IMSI value, however, is in total contrast to the “artificial” IMSI value that is required by the instant claims. The IMSI value in the claimed invention is artificial - not real - and is, ostensibly, of no use to any entity other than the intermediary that generated it in the first place. The IMSI supplied in Haumont is precisely intended to be used/relied upon by other network components. This is not the case in the present invention.

Since Haumont does not disclose or suggest the generation or use of an “artificial” IMSI value, any combination of Haumont with the other prior art of record would still not result in the claimed invention. Reconsideration and withdrawal of the §103(a) rejection is therefore respectfully urged.

Furthermore, new claims 13-15 recite a specific formula for the claimed artificial IMSI value. Neither Haumont, nor any of the other prior art of record, discloses such a combination of data to generate an artificial IMSI value. Thus, new claims 13-15 are also clearly patentable over the prior art of record as well.

In view of the foregoing all of the claims in this case are believed to be in condition for allowance. Should the Examiner have any questions or determine that any further action is desirable to place this application in even better condition for issue, the Examiner is encouraged to telephone applicants' undersigned representative at the number listed below.

In view of the foregoing all of the claims in this case are believed to be in condition for allowance. Should the Examiner have any questions or determine that any further action is desirable to place this application in even better condition for issue, the Examiner is encouraged to telephone Applicants' undersigned representative at the number listed below.

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